

THIS IS THE BEGINNING OF ADMINSTRATIVE FINE CASE  
# 288

DATE FILMED 1/2/02 CAMERA NO. 1

CAMERAMAN ESS

**WESTERN  
UNION**

CONFIRMATION OF MAILGRAM TO: LELA D 'KITTY' PUMPHREY  
IDAHO REPUBLICAN PARTY  
PO BOX 2267  
BOISE ID 83701-2267

JOHN MUCKLE-REPORT ANALYSIS DIV.  
FEDERAL ELECTION COMMISSION  
999 E ST NW  
WASHINGTON DC 20463

DECEMBER 27, 2000

IDENTIFICATION NUMBER: C00170175

REFERENCE: 30 DAY POST-GENERAL REPORT (10/01/2000 - 11/27/2000)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER, UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES.

FAILURE TO TIMELY FILE THIS REPORT MAY RESULT IN CIVIL MONEY PENALTIES, AN AUDIT OR LEGAL ENFORCEMENT ACTION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT EDWARD RYAN ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
LEGISLATIVE

2001 FEB 28 A 9 13

February 27, 2001...

MEMORANDUM

**SENSITIVE**

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR

FROM: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REASON TO BELIEVE RECOMMENDATION -  
12 DAY PRE-GENERAL AND 30 DAY POST-GENERAL  
REPORTS FOR THE ADMINISTRATIVE FINES  
PROGRAM

Attached are two lists of political committees and their treasurers who failed to file or timely file the 2000 12 Day Pre-General and/or the 2000 30 Day Post-General Reports in accordance with 2 U.S.C. 434(a). The 12 Day Pre-General list is comprised of unauthorized committees filing quarterly that made general election contributions or expenditures from October 1, 2000 through October 18, 2000. The 30 Day Post-General list is comprised of authorized committees whose candidates sought election in the November 7<sup>th</sup> General Election, as well as unauthorized committees filing either quarterly or monthly.

On October 2, 2000, Prior Notice was sent to the political committees and their treasurers, informing them that the 12 Day Pre-General Report was due on October 26, 2000 and should cover the period from October 1, 2000 through October 18, 2000. The same Prior Notice informed the committees that the 30 Day Post-General Report was due on December 7, 2000 and should cover the period from October 19, 2000 to November 27, 2000 or from October 1, 2000 through November 27, 2000, if the 12 Day Pre-General Report was not required. On November 13, 2000, a reminder notice was sent to the committees.

The committees appearing on the 12 Day Pre-General Report list either filed the report more than five (5) days after the due date or failed to file the report prior to four (4) days before the General Election (considered a non-filed report). The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report more than five (5) days after the due date or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. 111.43, these committees should be assessed the civil money penalties included on the attached lists.

As noted above, this circulation includes unauthorized committees filing quarterly that failed to file or failed to timely file the 12 Day Pre-General Report. Unlike unauthorized committees that file on a monthly basis, a quarterly filer need only file this report if it made general election contributions or expenditures between the dates of October 1, 2000 and October 18, 2000. In order to accurately identify the committees for administrative fines purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12 Day Report) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed general election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2000 through November 27, 2000 (58 days), was reviewed for activity which would have required the filing of a 12 Day Report. If our research indicated that the 12 Day Report was required, we took 31% (18 days) of the total activity of the 30 Day Report to arrive at the estimated level of activity on which to base the fine amount. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the remaining 69% (40 days) of activity. In these cases, the committees will appear on both lists and will be assessed a fine for both the 12 Day and 30 Day Reports based on the estimated levels of activity described above.
- We discovered several instances of overlapping reporting periods which resulted in duplicate activity. This was most prevalent with unauthorized monthly filers that submitted monthly reports in addition to the 30 Day Reports. For example, a committee files its November Monthly Report on November 20, 2000, covering October 1, 2000 through October 31, 2000. It then files its 30

Day Report on January 4, 2001, twenty-eight days late. Its 30 Day Report covers part of its previously-filed November Report (October 19 through October 31) which was actually filed before the due date of the 30 Day Report. In such instances, we excluded the amount of previously-disclosed activity and based the civil money penalty on the amount of activity that was not disclosed timely. We applied this same logic where a monthly filer failed to file the 30 Day Report altogether, but filed monthly reports covering the activity of the 30 Day reporting period.

- Rather than filing a 12 Day Report or a 30 Day Report, some committees filed a Year End Report covering October 1, 2000 through December 31, 2000. Here, we based the fine on the estimated level of activity occurring within the dates of the 12 Day Report, if required, and/or the 30 Day Report.
- In instances where committees used improper coverage dates which extended into the next reporting period, we excluded this activity before calculating the civil money penalty. For example, if a committee filed an October Quarterly Report but improperly extended the coverage period into the month of October, RAD excluded the amount of this activity when calculating the fine amount for the 30 Day Report, because that portion of activity was timely reported.

The 30 Day Report list includes committees that have been assessed previous violations under the administrative fines program. The committees are: Federal Managers' Association Political Action Committee (AF #274) (2 previous violations)

Clarke 2000 (AF #250) (1 previous violation), Peco Energy Company Political Action Committee (AF #310) (1 previous violation) and International Council of Cruise Lines Political Action Committee (AF #303) (1 previous violation)

At the executive session held December 5, 2000, the Commission directed RAD to come forward with a recommendation regarding the equitable assessment of previous violations. On January 5, 2001, RAD circulated its recommendation in an internal procedures memorandum but subsequently withdrew the document in order to allow OGC sufficient time in which to comment. RAD has received OGC's comments and will be circulating a redrafted document within the next few weeks.

Until the Commission can review our redrafted document, we recommend the Commission not consider the previous violations for the committees listed above. This would be consistent with the treatment the Commission has afforded all other previous violators to date. If approved, the civil money penalties would

be the following: Federal Managers' Association Political Action Committee would be reduced from \$675 to \$450

Clarke 2000 would be reduced from \$1,125 to \$900, Peco Energy Company Political Action Committee would be reduced from \$2,250 to \$1,800 and International Council of Cruise Lines Political Action Committee would be reduced from \$3,375 to \$2,700.

### Recommendation

1. Find reason to believe that the political committees and their treasurers (except those identified in recommendations 2 and 4) listed on the RTB Circulation Reports violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Reports.
2. Find reason to believe that Federal Managers' Association Political Action Committee and R. Mark Gable, Treasurer (AF #274)

Clarke 2000 and Raynel L. Trotman, Treasurer (AF #250), Peco Energy Company Political Action Committee and Theresa M. Ruch, Treasurer (AF #310) and International Council of Cruise Lines Political Action Committee and J. Michael Crye, Treasurer (AF #303), violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties for these committees be reduced

3. Send the appropriate letters.
- 4.

12 DAY PRE-GENERAL REPORT

22.05.254.1364

FEDERAL ELECTION COMMISSION 1999-2000  
Reason to Believe Circulation Report  
2000 12 DAY PRE-GENERAL

AF #	COMMITTEE NAME	RECEIPT DATE	TREASURER	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0327	NATIONAL COTTON COUNCIL COMMITTEE FOR THE ADVANCEMENT OF COTTON		WILLIAM R TRACY	7	\$5,874	\$432,757	TN	Yes	0		\$325
AF0328	AMERICA SERVICE GROUP INC POLITICAL ACTION COMMITTEE		JEAN L BYASSE	Not Filed	\$8,821 (est)	\$134,373	TN	Yes	0		\$1,000
AF0329	AMERICANS FOR SOUND ENERGY POLICY		GREGG D RENKES	Not Filed	\$24,022	\$245,983	VA	Yes	0		\$1,000
AF0330	PRAIRIE LEADERSHIP COMMITTEE		PAM TERRELL	Not Filed	\$6,299 (est)	\$121,680	DC	Yes	0		\$1,000
AF0331	AMERICAN AMBULANCE ASSOCIATION FEDERAL PAC (AKA AMBU-PAC)		TRISTAN NORTH	Not Filed	\$10,310	\$287,223	DC	Yes	0		\$1,000
AF0332	AMERICAN CONCRETE PAVEMENT ASSOCIATION PAC (ACPA PAC)		VALENTIN J RIVA	Not Filed	\$3,705 (est)	\$124,316	IL	Yes	0		\$1,000
AF0333	AMERICAN CROP PROTECTION ASSOCIATION POLITICAL ACTION COMMITTEE		JAY J VROOM	Not Filed	\$4,800	\$222,171	DC	Yes	0		\$1,000
AF0334	AMERICAN MEAT INSTITUTE POLITICAL ACTION COMMITTEE		SARA J LILYGREN	Not Filed	\$44,150	\$431,015	VA	Yes	0		\$2,000
AF0335	AMERICAN MOVING AND STORAGE ASSOCIATION FXA AMERICAN MOVERS CONF		ROBERT G DRUMMER	Not Filed	\$4,125	\$110,955	VA	Yes	0		\$1,000

\* This activity is included in the 30 Day Post-General Report.



FEDERAL ELECTION COMMISSION 1999-2000  
Reason to Believe Circulation Report  
2000 12 DAY PRE-GENERAL

AF #	COMMITTEE NAME	COMMITTEE ID	RECEIPT DATE	TREASURER	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0337	AMERICAN SOCIETY FOR CLINICAL LABORATORY SCIENCE POLITICAL ACTION	WA									
	C00034645	*	11/21/2000	SUSAN MILLER	\$3,129 (est)	\$121,085		Yes	0		\$1,000
				Not Filed							
AF0338	ANN ARBOR NATIONAL POLITICAL ACTION COMMITTEE	MI									
	C00348045		11/03/2000	JOSEPH J CELIA	\$17,709 (est)	\$284,333		Yes	0		\$1,000
				Not Filed							
AF0339	ASSOCIATION OF AMERICAN RAILROADS POLITICAL ACTION COMMITTEE (RAI	DC									
	C00280743	*	12/06/2000	CASSANDRA HENRY	\$2,519 (est)	\$242,515		Yes	0		\$1,000
				Not Filed							
AF0340	AUTONATION INC POLITICAL ACTION COMMITTEE	FL									
	C00330514		01/10/2001	COLEMAN EDMUNDS	\$5,000	\$167,304		Yes	0		\$1,000
				Not Filed							
AF0341	BURSON-MARSTELLER/YOUNG & RUBICAM PAC (B-M/Y&R PAC) FKA BURSON-MA	DC									
	C00201863	*	12/06/2000	PETER SLOANE	\$5,637 (est)	\$202,687		Yes	0		\$1,000
				Not Filed							
AF0342	CALIFORNIA DENTAL ASSOCIATION POLITICAL ACTION COMMITTEE - FEDERA	CA									
	C00005751		11/06/2000	ANN PECK	\$62,878	\$300,532		Yes	0		\$3,000
				Not Filed							
AF0343	COCA-COLA ENTERPRISES INC EMPLOYEE NONPARTISAN COMMITTEE FOR GOOD	GA									
	C00250134		11/20/2000	LAURA B ASMAN	\$11,800	\$562,804		Yes	0		\$1,000
				Not Filed							
AF0346	DISTILLED SPIRITS COUNCIL OF THE UNITED STATES INC POLITICAL ACTI	DC									
	C00030734	*	01/02/2001	MS SHANE SCHRIEFER	\$4,836 (est)	\$156,707		Yes	0		\$1,000
				Not Filed							

\* This activity is included in the 30 Day Post-General Report.

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AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0349	FIGHT-PAC	C00305797	MARK D RODGERS	12/06/2000 *	Not Filed	\$68,906 (est)	VA				
							\$331,546	Yes	0		\$3,000
AF0350	GENESIS HEALTH VENTURES INC POLITICAL ACTION COMMITTEE	C00292094 *	LAURENCE F. LANE	12/07/2000 *	Not Filed	\$8,391 (est)	PA				
							\$456,180	Yes	0		\$1,000
AF0351	HOLLAND AMERICA LINE WESTOURS, INC. PAC (HALPAC)	C00287714	LARRY D CALKINS	11/28/2000	Not Filed	\$3,000	WA				
							\$139,414	Yes	0		\$1,000
AF0352	ICE CREAM, MILK&CHEESE PAC-INTL ICE CREAM ASSN, MILK INDUSTRY FDT DC	C00128231 *	ANNE DEVLIN	12/06/2000 *	Not Filed	\$3,265 (est)	DC				
							\$384,255	Yes	0		\$1,000
AF0353	INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC GOOD GOVERNMENT P	C00332031	D L CASEY	01/03/2001	Not Filed	\$4,025	VA				
							\$233,602	Yes	0		\$1,000
AF0354	LEADERSHIP PAC 2000	C00314641 *	PAM SEDERHOLM	12/07/2000 *	Not Filed	\$31,613 (est)	VA				
							\$1,149,421	Yes	0		\$2,000
AF0356	LOOSE GROUP; THE	C00010793	FRANK G STEVENSON JR	12/07/2000 *	Not Filed	\$25,106 (est)	GA				
							\$301,666	Yes	0		\$2,000

\* This activity is included in the 30 Day Post-General Report.

2000 12 DAY PRE-GENERAL

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FEDERAL ELECTION COMMISSION 1999-2000  
Reason to Believe Circulation Report  
2000 12 DAY PRE-GENERAL

AF #	COMMITTEE NAME	COMMITTEE ID	RECEIPT DATE	COMMITTEE TREASURER	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0357	MADISON PROJECT INC FUND;THE	C00298000	11/22/2000	TIMOTHY TEEPELL	Not Filed	\$11,249	\$275,534	DC	Yes	0		\$1,000
AF0358	NATIONAL ASSOCIATION OF MORTGAGE BROKERS POLITICAL ACTION COMMITTEE	C00254201	01/31/2001 *	CHANNING J NUSS	Not Filed	\$25,768 (est)	\$708,484	VA	Yes	0		\$2,000
AF0359	NATIONAL ASSOCIATION OF WHEAT GROWERS POLITICAL ACTION COMMITTEE	C00139964	12/07/2000 *	WAYNE HAPPHON	Not Filed	\$3,658 (est)	\$189,209	DC	Yes	0		\$1,000
AF0360	NATIONAL AUCTIONEERS ASSOCIATION PAC (AUCTION PAC)	C00296962	12/07/2000 *	CHARLES F BOHN	Not Filed	\$1,271 (est)	\$213,120	KS	Yes	0		\$1,000
AF0361	NATIONAL UTILITY CONTRACTORS ASSN LEGISLATIVE INFORMATION & ACTION	C00004101	11/15/2000	MR A WILLIAM HILLMAN	Not Filed	\$19,050	\$365,370	VA	Yes	0		\$1,000
AF0365	OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE	C00045781	11/07/2000	NANCY FLETCHER	Not Filed	\$3,200	\$196,843	DC	Yes	0		\$1,000
AF0366	PLASTERS LOCAL 8 PAC FUND/OPERATIVE PLAST & CEM MAS INTER ASSOC	C00319905	12/07/2000 *	THOMAS KILKENNY	Not Filed	\$5,818 (est)	\$142,571	PA	Yes	0		\$1,000

\* This activity is included in the 30 Day Post-General Report.

FEDERAL ELECTION COMMISSION 1999-2000  
Reason to Believe Circulation Report  
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AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0367	RITE AID POLITICAL ACTION COMMITTEE	C00104083	JAMES KRAHULEC	01/16/2001	\$144,748	\$657,067	PA	Yes	0	\$5,000
			Not Filed							
AF0368	ROLLS-ROYCE NORTH AMERICA POLITICAL ACTION COMMITTEE FKA ALLISON	C00296822	MICHELE H MCCLOUD	12/11/2000	\$2,074 (est)	\$122,768	VA	Yes	0	\$1,000
			Not Filed							
AF0369	RYDER EMPLOS POLITICAL ACTION COMMITTEE (FORMERLY KNOWN AS RYDER C	C00088435	ANTHONY G TEGNELIA	01/16/2001	\$3,944 (est)	\$218,768	FL	Yes	0	\$1,000
			Not Filed							
AF0370	SERVICES GROUP OF AMERICA POLITICAL ACTION COMMITTEE	C00224618	MARK GREENE	12/19/2000	\$4,638 (est)	\$157,242	WA	Yes	0	\$1,000
			Not Filed							
AF0371	SOUTHDOWN INC POLITICAL ACTION COMMITTEE	C00111880	THOMAS E DRYAN	12/13/2000	\$10,079 (est)	\$545,303	TX	Yes	0	\$1,000
			Not Filed							
AF0372	SUNBELT GOOD GOVERNMENT COMMITTEE OF WINN-DIXIE STORES, INC.	C00033092	JEFFREY GLEASON	12/04/2000	\$2,172 (est)	\$269,499	FL	Yes	0	\$1,000
			Not Filed							
AF0373	SUNTRUST MID-ATLANTIC RESPONSIBLE GOVERNMENT FUND FKA (CRESTAR RE	C00214965	MRS BRENDA L SKIDMORE	12/05/2000	\$10,500	\$141,077	VA	Yes	0	\$1,000
			Not Filed							
AF0374	TEXAS-NEW MEXICO POWER COMPANY RESPONSIBLE GOVERNMENT ASSOCIATION	C00102798	MR SCOTT FORBES	11/10/2000	\$14,538	\$156,671	TX	Yes	0	\$1,000
			Not Filed							
AF0375	TRICON GLOBAL RESTAURANTS INC GOOD GOVERNMENT FUND	C00329474	WILLIAM EHRIE	12/07/2000	\$7,000	\$195,688	KY	Yes	0	\$1,000
			Not Filed							
AF0376	WADDELL & REED FINANCIAL INC PAC (AKA WADDELL & REED FINANCIAL IN	C00340745	JAMES CLARENCE CUSSE	01/03/2001	\$14,908	\$127,742	KS	Yes	0	\$1,000
			Not Filed							

\* This activity is included in the 30 Day Post-General Report.

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AF0377	WESTERN PISTACHIO ASSOCIATION PISTACHIO POLITICAL ACTION COMMITTEE DC	0
C00197715	DR JOHN LAKE	Yes
11/22/2000	Not Filed	
	\$2,000	\$1,000

**30 DAY POST-GENERAL REPORT**

FEDERAL ELECTION COMMISSION 1999-2000  
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AP #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	COMMITTEE ID	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0239	DRISCOLL FOR CONGRESS	C00347377	LAURA I MACCASKILL	12/13/2000			\$21,363	\$162,610	IL	DRISCOLL, DENNIS J	No	0	\$250
AF0240	YOB 2000 (Y2K)	C00353722	KEITH CHARTERS	12/14/2000			\$165,921 (est)	\$1,367,960	MI	YOB, CHARLES W	No	0	\$1,850
AF0241	EVA CLAYTON COMMITTEE FOR CONGRESS	C00257543	PAISY T HARGROVE	12/27/2000			\$146,220 (est)	\$762,768	NC	CLAYTON, EVA MCPHERSON	No	0	\$3,100
AF0242	FRIENDS OF BARRY FORD	C00111476	LISA A MENSCH					\$584,628	NY	FORD, BARRY DWAYNE	No	0	
AF0244	CARROLL 2000	C00358135	BRIAN K YOMONO	Not Filed			\$68,220 (est)	\$204,660	HI	CARROLL, JOHN STANLEY	No	0	\$2,700
AF0245	GERALD C "JERRY" WELLS FOR CONGRESS	C00285809	LAUREN DEES	01/08/2001			\$365,481	\$2,479,862	IL	WELLS, GERALD	No	0	\$9,000
AF0247	FRIENDS OF JOHN CONYERS	C00066201	JAMES W WISE	Not Filed			\$98,630 (est)	\$690,415	MI	CONYERS, JOHN JR	No	0	\$3,500

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FEDERAL ELECTION COMMISSION 1999-2000  
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AF0248	DUNN LAMPTON FOR CONGRESS	C00353607	WAYNE HUTCHISON	02/02/2001	\$116,779	\$806,360	MS	LAMPTON, DUNNICA OH	No	0	\$4,500
AF0250	CLARKE 2000	C00343948	RAYNEL' L TROTMAN	02/01/2001	\$13,715	\$286,434	NY	CLARKE, UNA S	No	1	\$1,125
AF0251	AZINGER FOR CONGRESS COMMITTEE	C00351858	DAVID DILLEY	01/08/2001	\$58,675 (est)	\$400,907	OH	AZINGER, MIKE	No	0	\$2,700
AF0253	DUNCAN/HILLEARY CONGRESSIONAL CELEBRATION COMMITTEE	C00360040	ROBERT E NICHOLS	Not Filed	\$74,517 (est)	\$149,035	TN	HILLEARY, WILLIAM V	No	0	\$2,700
AF0254	PAUL WILLIAMS FOR CONGRESS	C00347682	MIKE MUNDY	Not Filed	\$33,157 (est)	\$232,101	TX	WILLIAMS, PAUL	No	0	\$1,800
AF0256	FEDERAL INDEPENDENT CAMPAIGN COMMITTEE	C00262923	DEBORAH MCCOY	01/03/2001	\$17,511	\$108,232	IL		No	0	\$775
AF0257	HUMANEUSA POLITICAL ACTION COMMITTEE	C00350439	LINDA MARIE NEALON	12/14/2000	\$44,050	\$281,940	CA		No	0	\$550



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FEDERAL ELECTION COMMISSION 1999-2000  
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AF0258	INTERNET LEADERSHIP PAC	C0035240	CHRISTOPHER ROOSA	01/05/2001	\$3,024	\$103,248	VA	No	0		\$825
AF0259	AAN-NURSEY INDUSTRY POLITICAL ACTION COMMITTEE	C00022988	ANTHONY R BEDELL	12/22/2000	\$30,848 (est)	\$340,158	DC	No	0		\$950
AF0260	AMERICAN ACADEMY OF EMERGENCY MEDICINE POLITICAL ACTION COMMITTEE	C00324780	WILLIAM R LITTLE MD FFAEM	01/03/2001	\$3,093	\$111,484	WI	No	0		\$775
AF0261	AMERICAN MEAT INSTITUTE POLITICAL ACTION COMMITTEE	C00024281	SARA J LILYGREN	12/18/2000	\$22,250	\$453,265	VA	No	0		\$375
AF0262	AMERICAN MOVING AND STORAGE ASSOCIATION FKA AMERICAN MOVERS	C00255257	ROBERT G DRUMMER	01/02/2001	\$3,275	\$114,230	VA	No	0		\$750
AF0264	ASSOCIATED GENERAL CONTRACTORS OF AMERICA POLITICAL ACTION COMMITTEE	C00082917	STEPHEN E SANDHERR	12/15/2000	\$30,640	\$1,682,494	VA	No	0		\$600
AF0265	BAKERY CONFECTIONERY TOBACCO WKRS & GRAIN MILLERS INT'L UNION LOC	C00249359	DANIEL S KOLAR	01/05/2001	\$7,459 (est)	\$116,383	OH	No	0		\$825
AF0266	BANCORP SOUTH BANK FKA BANK OF MISSISSIPPI OFFICERS VOLUNTARY	C00183962	L NASH ALLEN JR	12/13/2000	\$10,233	\$121,539	MS	No	0		\$250
AF0267	BIPARTISAN VOLUNTARY PUBLIC AFFAIRS COMMITTEE OF PNC BANK NATIONAL PA	C00035519	RONALD E VARMECKY	12/13/2000	\$28,397	\$627,540	PA	No	0		\$500

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FEDERAL ELECTION COMMISSION 1999-2000  
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AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0268	CALIFORNIA RIGHT TO LIFE POLITICAL ACTION COMMITTEE	C00117440	CHRIS MILLER	12/13/2000	\$78,739	\$172,094	CA	No	0		\$1,000
AF0270	COMMITTEE FOR RESPONSIBLE GOVERNMENT OF TEMPLE-INLAND INC. (FKA C TX	C00080721	RYAN R. SORRELL	12/15/2000	\$27,072	\$417,300	TX	No	0		\$600
AF0271	DEMOCRATIC FOUNDATION OF THE DESERT; THE	C00348144	OSCAR G ARMijo	12/19/2000	\$46,284	\$156,254	CA	No	0		\$800
AF0272	DISTILLED SPIRITS COUNCIL OF THE UNITED STATES INC POLITICAL ACTI	C00030734	MS SHANE SCHRIEFER	01/02/2001 *	\$10,758 (est)	\$147,556	DC	No	0		\$750
AF0273	EXXON MOBIL CORPORATION POLITICAL ACTION COMMITTEE (EXXONMOBIL PA TX	C00121368	KAREN M KRESTA	12/19/2000	\$33,533 (est)	\$1,549,696	TX	No	0		\$800
AF0274	FEDERAL MANAGERS' ASSOCIATION POLITICAL ACTION COMMITTEE	C00164848	R MARK GABLE	12/21/2000	\$9,155	\$151,289	VA	No	2		\$675
AF0275	INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC GOOD GOVERNMENT P	C00332031	D L CASEY	01/03/2001	\$4,474	\$229,577	VA	No	0		\$775
AF0276	NATIONAL COMMUNITY PHARMACISTS ASSOCIATION POLITICAL ACTION COMMI	C00030809	MARK W LAPPEN	12/20/2000	\$15,564 (est)	\$312,753	VA	No	0		\$425
AF0277	NATIONAL PEST CONTROL ASSOCIATION POLITICAL ACTION COMMITTEE	C00081915	MR ROBERT M ROSENBERG	12/15/2000	\$5,218	\$117,063	VA	No	0		\$300

\* Contains 12 Day Pre-General Report Activity.

FEDERAL ELECTION COMMISSION 1999-2000  
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AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0278	QUEST COMMUNICATIONS INTERNATIONAL INC										
		C00237156	JERROLD THOMPSON	8	\$66,023	\$584,397	CO	No	0		\$900
		12/15/2000									
AF0279	RELIANT ENERGY ENTER (RELIANT ENERGY RESOURCES CORP)										
		C00333534	ROBERT W CLAUDE	15	\$17,867	\$199,643	TX	No	0		\$475
		12/22/2000									
AF0281	SERVICES GROUP OF AMERICA POLITICAL ACTION COMMITTEE										
		C00224618	MARKE GREENE	12	\$10,320 (est)	\$154,711	WA	No	0		\$400
		12/19/2000 *									
AF0282	SOUTHDOWN INC POLITICAL ACTION COMMITTEE										
		C00111880	THOMAS E DAMAN	6	\$22,423 (est)	\$528,062	TX	No	0		\$250
		12/13/2000 *									
AF0283	TRANSPORT WORKERS UNION - LOCAL 100 POLITICAL CONTRIBUTIONS COMMI										
		C00135475	DENNIS CALHOUN	22	\$80,845 (est)	\$2,788,468	NY	No	0		\$2,600
		12/29/2000									
AF0284	WADDELL & REED FINANCIAL INC PAC (AKA WADDELL & REED FINANCIAL IN										
		C00340745	JAMES CLARENCE CUSSE	27	\$3,142	\$130,884	KS	No	0		\$775
		01/03/2001									
AF0285	WOMEN'S CAMPAIGN FUND INC										
		C00015024	LYNN S MARTIN	7	\$142,294 (est)	\$2,864,525	DC	No	0		\$1,475
		12/14/2000									
AF0287	THE GREENS/GREEN PARTY USA										
		C00319699	JENNIFER KENNEY	19	\$20,374	\$236,071	MA	No	0		\$575
		12/26/2000									

\* Contains 12 Day Pre-General Report Activity.

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AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0288	IDAHO REPUBLICAN PARTY											
	C00170175		LELA D 'KITTY' PUMPHREY		26	\$242,502	\$1,386,254	ID	No		0	\$5,550
	01/02/2001											
AF0290	AMERICANS FOR SOUND ENERGY POLICY											
	C00214601		GREGG D RENKES			\$26,246	\$215,761	VA	No		0	\$1,800
	01/31/2001		Not Filed									
AF0292	PRAIRIE LEADERSHIP COMMITTEE											
	C00351049		PAM TERRELL			\$14,022 (est)	\$103,642	DC	No		0	\$900
	01/30/2001*		Not Filed									
AF0294	11998 32BJ/144 SERVICE EMPLOYEES INTERNAT'L UNION HOME CARE											
	C00344531		PHYLLIS HARRIS			\$33,399	\$203,237	NY	No		0	\$1,800
	01/09/2001		Not Filed									
AF0295	AMERICAN AMBULANCE ASSOCIATION FEDERAL PAC (AKA AMBU-PAC)											
	C00168070		TRISTAN NORTH			\$6,993	\$276,913	DC	No		0	\$900
	01/09/2001		Not Filed									
AF0296	AMERICAN CONCRETE PAVEMENT ASSOCIATION PAC (ACPA PAC)											
	C00322727		VALENTIN J RIVA			\$8,233 (est)	\$105,379	IL	No		0	\$900
	01/31/2001		Not Filed									

\* Contains 12 Day Pre-General Report Activity.

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AF #	COMMITTEE ID	COMMITTEE NAME	RECEIPT DATE	TREASURER	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0298	ARPAC C00226472 01/24/2001	B JEFFREY BROOKS Not Filed				\$16,000	\$153,750	LA	No	No	0	\$900
AF0299	AUTONATION INC POLITICAL ACTION COMMITTEE C00330514 01/10/2001	COLEMAN EDMUNDS Not Filed				\$10,000 (est)	\$132,304	FL	No	No	0	\$900
AF0300	CAMPAIGN AMERICA INC C00098369 02/02/2001	WESLEY T FOSTER Not Filed				\$5,058 (est)	\$1,189,534	TX	No	No	0	\$900
AF0301	FIRST HEALTH GROUP CORP (FHGPAC) C00217216 01/25/2001	JOSEPH E WHITTTERS Not Filed				\$500	\$350,362	IL	No	No	0	\$500
AF0302	GAF CORPORATION AND INTERNATIONAL SPECIALTY PRODUCTS INC C00205500 01/24/2001	SUSAN YOSS Not Filed				\$8,827	\$227,426	NJ	No	No	0	\$900
AF0303	INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM C00303073 Not Filed	J MICHAEL CRYE				\$59,432 (est)	\$297,164	ICCL VA	No	No	1	\$3,375
AF0304	IUE CMTE ON POL EDUC INT'L UNION/ELECTRONIC ELECTRICAL TECH SALAR C00006247 01/09/2001	EDWARD FIRE Not Filed				\$74,573	\$1,268,033	DC	No	No	0	\$2,700
AF0305	LAWYERS FOR BETTER GOVERNMENT FUND-FEDERAL C00217984 01/31/2001	MICHAEL R MARGET Not Filed				\$20,000	\$117,480	IL	No	No	0	\$900
AF0307	NATIONAL ASSOCIATION OF MORTGAGE BROKERS POLITICAL ACTION COMMITTEE C00254201 01/31/2001	CHANNING J NUSS Not Filed				\$57,324 (est)	\$614,742	VA	No	No	0	\$2,700

\* Contains 12 Day Pre-General Report Activity.

AF #	COMMITTEE NAME	STATE	CANDIDATE NAME	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
COMMITTEE ID	TREASURER	THRESHOLD AMOUNT	SENSITIVE		
RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY			
AF0308	NATIONAL FISHERIES INSTITUTE FISHERIES POLITICAL ACTION COMMITTEE VA				
C00101204	MR RICHARD E GUTTING JR	\$11,428	No	0	\$900
01/23/2001	Not Filed				
AF0309	PARK PLACE ENTERTAINMENT FEDERAL PAC INC				
C00342311	SCOTT LAPORTA	\$14,000	No	0	\$900
01/08/2001	Not Filed				
AF0310	PECO ENERGY COMPANY POLITICAL ACTION COMMITTEE (FKA: PHILADELPHIA PA				
C00160101	THERESA M RUCH	\$48,169 (est)	No	1	\$2,250
	Not Filed				
AF0311	POLITICAL ACTION COUNCIL OF EDUCATORS(UNITED TEACHERS-LOS ANGELES CA				
C00023754	PATRICIA STANYO	\$7,045	No	0	\$900
01/08/2001	Not Filed				
AF0312	RE-ELECT FRESHMAN OF THE REPUBLICAN MAJORITY (REFORM PAC)				
C00315275	LAUREN DEES	\$77,572	No	0	\$3,500
01/08/2001	Not Filed				
AF0313	RITE AID POLITICAL ACTION COMMITTEE				
C00104083	JAMES KRAHULEC	\$60,337	No	0	\$2,700
01/16/2001	Not Filed				
AF0314	RYDER EMPLS POLITICAL ACTION COMMITTEE (FORMERLY KNOWN AS RYDER C FL				
C00088435	ANTHONY G TEGNELIA	\$8,670 (est)	No	0	\$900
01/16/2001	Not Filed				
AF0315	SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL NO 99 FEDERAL POLITIC CA				
C00323451	JANETT HUMPHRIES	\$504 (est)	No	0	\$504
02/01/2001	Not Filed				
AF0316	SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 434-B FEDERAL COPE CA				
C00340752	VERDIA DANIELS	\$68,846 (est)	No	0	\$2,700
02/01/2001	Not Filed				
AF0317	UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL NJ				
C00173419	JAMES REED	\$13,895	No	0	\$900
01/22/2001	Not Filed				

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AF #	COMMITTEE NAME		LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME		PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
	COMMITTEE ID	TREASURER				SENSITIVE	PREVIOUS VIOLATIONS		
RECEIPT DATE	DAYS LATE								
-----									
AF0318	LEHIGH VALLEY DEMOCRATIC COMMITTEE				PA	No	0		\$1,800
	C00357764	THOMAS F QUIRK	\$40,123 (est)		\$120,370				
	Not Filled								
AF0319	LIBERTARIAN PARTY OF ILLINOIS				IL	No	0		\$2,700
	C00315713	STEVEN I GIVOT	\$69,612 (est)		\$278,450				
	Not Filled								
AF0320	NEW YORK STATE COMMITTEE OF THE WORKING FAMILIES PARTY				NY	No	0		\$2,700
	C00350991	LAWRENCE J HANLEY	\$71,194 (est)		\$284,778				
	Not Filled								



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

*Kluzen*  
**SENSITIVE**

DATE & TIME OF TRANSMITTAL: Wednesday, February 28, 2001 11:00

BALLOT DEADLINE: Monday, March 05, 2001 4:00

COMMISSIONER: MASON, McDONALD, SANDSTROM, SMITH, THOMAS, WOLD

SUBJECT: **Reason To Believe Recommendation - 12 Day Pre-General  
And 30 Day Post-General Reports For The Administrative  
Fines Program.**

( ) I approve the recommendation(s)

( ) I approve the recommendations except those following  
to which I object (please insert AF#)

---

---

( ) I approve the recommendations except those following  
in which I abstain (please insert AF#)

---

---

( ) I approve the recommendations except those following  
in which I am recused (please insert AF#)

---

---

A definite vote is required. All ballots must be signed and dated. Please return  
ONLY THE BALLOT to the Commission Secretary. Please return ballot no later  
than date and time shown above.

DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION



FILED  
FEB 23 11 01 AM '01

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason to Believe Recommendation 2000 ) Agenda Document No. X01-30  
30 Day Post-General Reports for the )  
Administrative Fines Program: )

DRISCOLL FOR CONGRESS, and LAURA I ) AF# 239  
MACCASKILL as treasurer; )  
YOB 2000 (Y2K), and KEITH CHARTERS as ) AF# 240  
treasurer; )  
EVA CLAYTON COMMITTEE FOR CONGRESS, ) AF# 241  
and PATSY T HARGROVE as treasurer; )  
FRIENDS OF BARRY FORD, and LISA A ) AF# 242  
MENSAH as treasurer; )

CARROLL 2000, and BRIAN K YOMONO as ) AF# 244  
treasurer; )  
GERALD C "JERRY" WELLER FOR CONGRESS, ) AF# 245  
and LAUREN DEES as treasurer; )

FRIENDS OF JOHN CONYERS, and JAMES W ) AF# 247  
WISE as treasurer; )  
DUNN LAMPTON FOR CONGRESS, and WAYNE ) AF# 248  
HUTCHISON as treasurer; )

CLARKE 2000, and RAYNEL' L TROTMAN as ) AF# 250  
treasurer; )  
AZINGER FOR CONGRESS COMMITTEE, and ) AF# 251  
DAVID DILLEY as treasurer; )

DUNCAN/HILLEARY CONGRESSIONAL ) AF# 253  
CELEBRATION COMMITTEE, and ROBERT E )  
NICHOLS as treasurer; )  
PAUL WILLIAMS FOR CONGRESS, and MIKE ) AF# 254  
MUNDY as treasurer; )

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FEDERAL INDEPENDENT CAMPAIGN ) AF# 256  
COMMITTEE, and DEBORAH MCCOY as )  
treasurer; )  
HUMANEUSA POLITICAL ACTION COMMITTEE, ) AF# 257  
and LINDA MARIE NEALON as treasurer; )  
INTERNET LEADERSHIP PAC, and ) AF# 258  
CHRISTOPHER ROOSA as treasurer; )  
AAN-NURSERY INDUSTRY POLITICAL ACTION ) AF# 259  
COMMITTEE, and ANTHONY R BEDELL as )  
treasurer; )  
AMERICAN ACADEMY OF EMERGENCY MEDICINE ) AF# 260  
POLITICAL ACTION COMMITTEE AAEM PAC, )  
and WILLIAM R LITTLE MD FAAEM as )  
treasurer; )  
AMERICAN MEAT INSTITUTE POLITICAL ) AF# 261  
ACTION COMMITTEE, and SARA J LILYGREN )  
as treasurer; )  
AMERICAN MOVING AND STORAGE ) AF# 262  
ASSOCIATION FKA AMERICAN MOVERS )  
CONFERENCE, and ROBERT G DRUMMER as )  
treasurer; )

ASSOCIATED GENERAL CONTRACTORS OF ) AF# 264  
AMERICA POLITICAL ACTION COMMITTEE, )  
and STEPHEN E SANDHERR as treasurer; )  
BAKERY CONFECTIONERY TOBACCO WKRS & ) AF# 265  
GRAIN MILLERS INT'L UNION LOCAL 19 POL )  
ORG "BCTGM", and DANIEL S KOLAR as )  
treasurer; )  
BANCORP SOUTH BANK PAC FKA BANK OF ) AF# 266  
MISSISSIPPI OFFICERS VOLUNTARY )  
POLITICAL COMMITTEE, and L NASH ALLEN )  
JR as treasurer; )

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BIPARTISAN VOLUNTARY PUBLIC AFFAIRS ) AF# 267  
COMMITTEE OF PNC BANK NATIONAL ASSOC )  
("PNCBANKPAC"), and RONALD E VARMECKY )  
as treasurer; )

CALIFORNIA RIGHT TO LIFE POLITICAL ) AF# 268  
ACTION COMMITTEE, and CHRIS MILLER as )  
treasurer; )

COMMITTEE FOR RESPONSIBLE GOVERNMENT ) AF# 270  
OF TEMPLE-INLAND INC. (FKA CMTE FOR )  
GOOD GOV OF TE.), and RYAN R. SORRELL )  
as treasurer; )

DEMOCRATIC FOUNDATION OF THE DESERT; ) AF# 271  
THE, and OSCAR G ARMIJO as treasurer; )

DISTILLED SPIRITS COUNCIL OF THE ) AF# 272  
UNITED STATES INC POLITICAL ACTION )  
COMMITTEE, and MS SHANE SCHRIEFER as )  
treasurer; )

EXXON MOBIL CORPORATION POLITICAL ) AF# 273  
ACTION COMMITTEE (EXXONMOBIL PAC), and )  
KAREN M KRESTA as treasurer; )

FEDERAL MANAGERS' ASSOCIATION ) AF# 274  
POLITICAL ACTION COMMITTEE, and R MARK )  
GABLE as treasurer; )

INDEPENDENT ELECTRICAL CONTRACTORS INC ) AF# 275  
PAC (IEC GOOD GOVERNMENT PAC), and D L )  
CASEY as treasurer; )

NATIONAL COMMUNITY PHARMACISTS ) AF# 276  
ASSOCIATION POLITICAL ACTION COMMITTEE )  
AKA NCPAPAC, and MARK W LAPPEN as )  
treasurer; )

NATIONAL PEST CONTROL ASSOCIATION ) AF# 277  
POLITICAL ACTION COMMITTEE, and MR )  
ROBERT M ROSENBERG as treasurer; )

QWEST COMMUNICATIONS INTERNATIONAL INC ) AF# 278  
POLITICAL ACTION COMMITTEE (QWEST )  
PAC), and JERROLD THOMPSON as )  
treasurer; )

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RELIANT ENERGY ENTEX (RELIANT ENERGY ) AF# 279  
RESOURCES CORP) CITIZENSHIP )  
RESPONSIBILITY GROUP, and ROBERT W )  
CLAUDE as treasurer; )

SERVICES GROUP OF AMERICA POLITICAL ) AF# 281  
ACTION COMMITTEE, and MARKE GREENE as )  
treasurer; )

SOUTHDOWN INC POLITICAL ACTION ) AF# 282  
COMMITTEE, and THOMAS E DAMAN as )  
treasurer; )

TRANSPORT WORKERS UNION - LOCAL 100 ) AF# 283  
POLITICAL CONTRIBUTIONS COMMITTEE, and )  
DENNIS CALHOUN as treasurer; )

WADDELL & REED FINANCIAL INC PAC (AKA ) AF# 284  
WADDELL & REED FINANCIAL INC PAC), and )  
JAMES CLARENCE CUSSEER as treasurer; )

WOMEN'S CAMPAIGN FUND INC, and LYNN S ) AF# 285  
MARTIN as treasurer; )

THE GREENS/GREEN PARTY USA, and ) AF# 287  
JENNIFER KENNEY as treasurer; )

IDAHO REPUBLICAN PARTY, and LELA D ) AF# 288  
'KITTY' PUMPHREY as treasurer; )

AMERICANS FOR SOUND ENERGY POLICY, and ) AF# 290  
GREGG D RENKES as treasurer; )

PRAIRIE LEADERSHIP COMMITTEE, and PAM ) AF# 292  
TERRELL as treasurer; )

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11998 32BJ/144 SERVICE EMPLOYEES	)	AF# 294
INTERNAT'L UNION HOME CARE POLITICAL	)	
ACTION COMMITTEE, and PHYLLIS HARRIS	)	
as treasurer;	)	
AMERICAN AMBULANCE ASSOCIATION FEDERAL	)	AF# 295
PAC (AKA AMBU-PAC), and TRISTAN NORTH	)	
as treasurer;	)	
AMERICAN CONCRETE PAVEMENT ASSOCIATION	)	AF# 296
PAC (ACPA PAC), and VALENTIN J RIVA as	)	
treasurer;	)	
ARPAC, and B JEFFREY BROOKS as	)	AF# 298
treasurer;	)	
AUTONATION INC POLITICAL ACTION	)	AF# 299
COMMITTEE, and COLEMAN EDMUNDS as	)	
treasurer;	)	
CAMPAIGN AMERICA INC, and WESLEY T	)	AF# 300
FOSTER as treasurer;	)	
FIRST HEALTH GROUP CORP (FHGPAC), and	)	AF# 301
JOSEPH E WHITTERS as treasurer;	)	
GAF CORPORATION AND INTERNATIONAL	)	AF# 302
SPECIALTY PRODUCTS INC, and SUSAN YOSS	)	
as treasurer;	)	
INTERNATIONAL COUNCIL OF CRUISE LINES	)	AF# 303
POLITICAL ACTION COMM (ICCL-PAC), and	)	
J MICHAEL CRYE as treasurer;	)	
IUE CMTE ON POL EDUC INT'L	)	AF# 304
UNION/ELECTRONIC ELECTRICAL TECH	)	
SALARIED MACH WORKERS AFL-CIO , and	)	
EDWARD FIRE as treasurer;	)	
LAWYERS FOR BETTER GOVERNMENT	)	AF# 305
FUND-FEDERAL, and MICHAEL R MARGET as	)	
treasurer;	)	
NATIONAL ASSOCIATION OF MORTGAGE	)	AF# 307
BROKERS POLITICAL ACTION COMMITTEE	)	
(NAMB PAC), and CHANNING J NUSS as	)	
treasurer;	)	

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NATIONAL FISHERIES INSTITUTE FISHERIES ) AF# 308  
POLITICAL ACTION COMMITTEE (FISHPAC), )  
and MR RICHARD E GUTTING JR as )  
treasurer; )  
PARK PLACE ENTERTAINMENT FEDERAL PAC ) AF# 309  
INC, and SCOTT LAPORTA as treasurer; )  
PECO ENERGY COMPANY POLITICAL ACTION ) AF# 310  
COMMITTEE (FKA: PHILADELPHIA ELECTRIC )  
COMPANY PAC), and THERESA M RUCH as )  
treasurer; )  
POLITICAL ACTION COUNCIL OF ) AF# 311  
EDUCATORS(UNITED TEACHERS-LOS )  
ANGELES), and PATRICIA STANYO as )  
treasurer; )  
RE-ELECT FRESHMAN OF THE REPUBLICAN ) AF# 312  
MAJORITY (REFORM PAC), and LAUREN DEES )  
as treasurer; )  
RITE AID POLITICAL ACTION COMMITTEE, ) AF# 313  
and JAMES KRAHULEC as treasurer; )  
RYDER EMPLS POLITICAL ACTION COMMITTEE ) AF# 314  
(FORMERLY KNOWN AS RYDER CMTE )  
EFFECTIVE GOVERNMENT), and ANTHONY G )  
TEGNELIA as treasurer; )  
SERVICE EMPLOYEES INTERNATIONAL UNION ) AF# 315  
LOCAL NO 99 FEDERAL POLITICAL ACTION )  
COMMITTEE, and JANETT HUMPHRIES as )  
treasurer; )  
SERVICE EMPLOYEES INTERNATIONAL UNION ) AF# 316  
LOCAL 434-B FEDERAL COPE, and VERDIA )  
DANIELS as treasurer; )  
UNITED ASSN JOURNEYMEN & APPRENT OF ) AF# 317  
PLUMB & PIPEFITTING IND LOCAL 322 COMM )  
FOR POL ED, and JAMES REED as )  
treasurer; )  
LEHIGH VALLEY DEMOCRATIC COMMITTEE, ) AF# 318  
and THOMAS F QUIRK as treasurer; )  
LIBERTARIAN PARTY OF ILLINOIS, and ) AF# 319  
STEVEN I GIVOT as treasurer; )

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NEW YORK STATE COMMITTEE OF THE ) AF# 320  
WORKING FAMILIES PARTY, and LAWRENCE J )  
HANLEY as treasurer; )

CERTIFICATION

I, Darlene Harris, recording secretary for the  
Federal Election Commission executive session on  
March 20, 2001, do hereby certify that the  
Commission took the following actions with respect  
to the Reports Analysis Division's Memorandum dated  
February 27, 2001, on the following committees:

AF# 239: , Decided by a vote of 6-0 (1) find reason to believe that the DRISCOLL FOR CONGRESS, and LAURA I MACCASKILL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 240: Decided by a vote of 6-0 (1) find reason to believe that the YOB 2000 (Y2K), and KEITH CHARTERS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 241: Decided by a vote of 6-0 (1) find reason to believe that the EVA CLAYTON COMMITTEE FOR CONGRESS, and PATSY T HARGROVE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.



Federal Election Commission  
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AF# 242: Decided by a vote of 6-0 (1) find reason to believe that the FRIENDS OF BARRY FORD, and LISA A MENSAH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 244: Decided by a vote of 6-0 (1) find reason to believe that the CARROLL 2000, and BRIAN K YOMONO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 245: Decided by a vote of 6-0 (1) find reason to believe that the GERALD C "JERRY" WELLER FOR CONGRESS, and LAUREN DEES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

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AF# 247: . Decided by a vote of 6-0 (1) find reason to believe that the FRIENDS OF JOHN CONYERS, and JAMES W WISE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 248: Decided by a vote of 6-0 (1) find reason to believe that the DUNN LAMPTON FOR CONGRESS, and WAYNE HUTCHISON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

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AF# 250: Decided by a vote of 6-0 (1) find reason to believe that the CLARKE 2000, and RAYNEL' L TROTMAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 251: Decided by a vote of 6-0 (1) find reason to believe that the AZINGER FOR CONGRESS COMMITTEE, and DAVID DILLEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 253: Decided by a vote of 6-0 (1) find reason to believe that the DUNCAN/HILLEARY CONGRESSIONAL CELEBRATION COMMITTEE, and ROBERT E NICHOLS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 254: Decided by a vote of 6-0 (1) find reason to believe that the PAUL WILLIAMS FOR CONGRESS, and MIKE MUNDY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 256: Decided by a vote of 6-0 (1) find reason to believe that the FEDERAL INDEPENDENT CAMPAIGN COMMITTEE, and DEBORAH MCCOY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 257: Decided by a vote of 6-0 (1) find reason to believe that the HUMANEUSA POLITICAL ACTION COMMITTEE, and LINDA MARIE NEALON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 258: Decided by a vote of 6-0 (1) find reason to believe that the INTERNET LEADERSHIP PAC, and CHRISTOPHER ROOSA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 259: Decided by a vote of 6-0 (1) find reason to believe that the AAN-NURSERY INDUSTRY POLITICAL ACTION COMMITTEE, and ANTHONY R BEDELL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 260: Decided by a vote of 6-0 (1) find reason to believe that the AMERICAN ACADEMY OF EMERGENCY MEDICINE POLITICAL ACTION COMMITTEE AAEM PAC, and WILLIAM R LITTLE MD FAAEM as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 261: Decided by a vote of 6-0 (1) find reason to believe that the AMERICAN MEAT INSTITUTE POLITICAL ACTION COMMITTEE, and SARA J LILYGREN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 262: Decided by a vote of 6-0 (1) find reason to believe that the AMERICAN MOVING AND STORAGE ASSOCIATION FKA AMERICAN MOVERS CONFERENCE, and ROBERT G DRUMMER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 264: Decided by a vote of 6-0 (1) find reason to believe that the ASSOCIATED GENERAL CONTRACTORS OF AMERICA POLITICAL ACTION COMMITTEE, and STEPHEN E SANDHERR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 265: Decided by a vote of 6-0 (1) find reason to believe that the BAKERY CONFECTIONERY TOBACCO WKRS & GRAIN MILLERS INT'L UNION LOCAL 19 POL ORG "BCTGM", and DANIEL S KOLAR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 266: Decided by a vote of 6-0 (1) find reason to believe that the BANCORP SOUTH BANK PAC FKA BANK OF MISSISSIPPI OFFICERS VOLUNTARY POLITICAL COMMITTEE, and L NASH ALLEN JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 267: Decided by a vote of 6-0 (1) find reason to believe that the BIPARTISAN VOLUNTARY PUBLIC AFFAIRS COMMITTEE OF PNC BANK NATIONAL ASSOC ("PNCBANKPAC"), and RONALD E VARMECKY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 268: Decided by a vote of 6-0 (1) find reason to believe that the CALIFORNIA RIGHT TO LIFE POLITICAL ACTION COMMITTEE, and CHRIS MILLER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

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AF# 270: , Decided by a vote of 6-0 (1) find reason to believe that the COMMITTEE FOR RESPONSIBLE GOVERNMENT OF TEMPLE-INLAND INC. (FKA CMTE FOR GOOD GOV OF TE.), and RYAN R. SORRELL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 271: Decided by a vote of 6-0 (1) find reason to believe that the DEMOCRATIC FOUNDATION OF THE DESERT; THE, and OSCAR G ARMIJO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 272: Decided by a vote of 6-0 (1) find reason to believe that the DISTILLED SPIRITS COUNCIL OF THE UNITED STATES INC POLITICAL ACTION COMMITTEE, and MS SHANE SCHRIEFER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.



AF# 273: Decided by a vote of 5-0 (1) find reason to believe that the EXXON MOBIL CORPORATION POLITICAL ACTION COMMITTEE (EXXONMOBIL PAC), and KAREN M KRESTA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas recused himself with respect to this matter and did not vote.

AF# 274: Decided by a vote of 6-0 (1) find reason to believe that the FEDERAL MANAGERS' ASSOCIATION POLITICAL ACTION COMMITTEE, and R MARK GABLE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 275: Decided by a vote of 6-0 (1) find reason to believe that the INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC GOOD GOVERNMENT PAC), and D L CASEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

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AF# 276: Decided by a vote of 6-0 (1) find reason to believe that the NATIONAL COMMUNITY PHARMACISTS ASSOCIATION POLITICAL ACTION COMMITTEE AKA NCPAPAC, and MARK W LAPPEN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 277: Decided by a vote of 6-0 (1) find reason to believe that the NATIONAL PEST CONTROL ASSOCIATION POLITICAL ACTION COMMITTEE, and MR ROBERT M ROSENBERG as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 278: Decided by a vote of 6-0 (1) find reason to believe that the QWEST COMMUNICATIONS INTERNATIONAL INC POLITICAL ACTION COMMITTEE (QWEST PAC), and JERROLD THOMPSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 279: Decided by a vote of 6-0 (1) find reason to believe that the RELIANT ENERGY ENTEX (RELIANT ENERGY RESOURCES CORP) CITIZENSHIP RESPONSIBILITY GROUP, and ROBERT W CLAUDE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

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AF# 281: , Decided by a vote of 6-0 (1) find reason to believe that the SERVICES GROUP OF AMERICA POLITICAL ACTION COMMITTEE, and MARKE GREENE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 282: Decided by a vote of 6-0 (1) find reason to believe that the SOUTHDOWN INC POLITICAL ACTION COMMITTEE, and THOMAS E DAMAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 283: Decided by a vote of 6-0 (1) find reason to believe that the TRANSPORT WORKERS UNION - LOCAL 100 POLITICAL CONTRIBUTIONS COMMITTEE, and DENNIS CALHOUN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 284: Decided by a vote of 6-0 (1) find reason to believe that the WADDELL & REED FINANCIAL INC PAC (AKA WADDELL & REED FINANCIAL INC PAC), and JAMES CLARENCE CUSSER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 285: Decided by a vote of 6-0 (1) find reason to believe that the WOMEN'S CAMPAIGN FUND INC, and LYNN S MARTIN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 287: Decided by a vote of 6-0 (1) find reason to believe that THE GREENS/GREEN PARTY USA, and JENNIFER KENNEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 288: Decided by a vote of 6-0 (1) find reason to believe that the IDAHO REPUBLICAN PARTY, and LELA D 'KITTY' PUMPHREY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 290: Decided by a vote of 6-0 (1) find reason to believe that the AMERICANS FOR SOUND ENERGY POLICY, and GREGG D RENKES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

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AF# 292: Decided by a vote of 6-0 (1) find reason to believe that the PRAIRIE LEADERSHIP COMMITTEE, and PAM TERRELL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 294: Decided by a vote of 6-0 (1) find reason to believe that the 11998 32BJ/144 SERVICE EMPLOYEES INTERNAT'L UNION HOME CARE POLITICAL ACTION COMMITTEE, and PHYLLIS HARRIS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 295: Decided by a vote of 6-0 (1) find reason to believe that the AMERICAN AMBULANCE ASSOCIATION FEDERAL PAC (AKA AMBU-PAC), and TRISTAN NORTH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 296: Decided by a vote of 6-0 (1) find reason to believe that the AMERICAN CONCRETE PAVEMENT ASSOCIATION PAC' (ACPA PAC), and VALENTIN J RIVA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 298: Decided by a vote of 6-0 (1) find reason to believe that the ARPAC, and B JEFFREY BROOKS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 299: Decided by a vote of 6-0 (1) find reason to believe that the AUTONATION INC POLITICAL ACTION COMMITTEE, and COLEMAN EDMUNDS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 300: Decided by a vote of 6-0 (1) find reason to believe that the CAMPAIGN AMERICA INC, and WESLEY T FOSTER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 301: . Decided by a vote of 6-0 (1) find reason to believe that the FIRST HEALTH GROUP CORP (FHGPAC), and JOSEPH E WHITTERS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 302: Decided by a vote of 6-0 (1) find reason to believe that the GAF CORPORATION AND INTERNATIONAL SPECIALTY PRODUCTS INC, and SUSAN YOSS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 303: Decided by a vote of 6-0 (1) find reason to believe that the INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC), and J MICHAEL CRYE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.



AF# 304: Decided by a vote of 6-0 (1) find reason to believe that the IUE CMTE ON POL EDUC INT'L UNION/ELECTRONIC ELECTRICAL TECH SALARIED MACH WORKERS AFL-CIO , and EDWARD FIRE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 305: Decided by a vote of 6-0 (1) find reason to believe that the LAWYERS FOR BETTER GOVERNMENT FUND-FEDERAL, and MICHAEL R MARGET as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 307: Decided by a vote of 6-0 (1) find reason to believe that the NATIONAL ASSOCIATION OF MORTGAGE BROKERS POLITICAL ACTION COMMITTEE (NAMB PAC), and CHANNING J NUSS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 308: Decided by a vote of 6-0 (1) find reason to believe that the NATIONAL FISHERIES INSTITUTE FISHERIES POLITICAL ACTION COMMITTEE (FISHPAC), and MR RICHARD E GUTTING JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 309: Decided by a vote of 6-0 (1) find reason to believe that the PARK PLACE ENTERTAINMENT FEDERAL PAC INC, and SCOTT LAPORTA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 310: . Decided by a vote of 6-0 (1) find reason to believe that the PECO ENERGY COMPANY POLITICAL ACTION COMMITTEE (FKA: PHILADELPHIA ELECTRIC COMPANY PAC), and THERESA M RUCH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 311: Decided by a vote of 6-0 (1) find reason to believe that the POLITICAL ACTION COUNCIL OF EDUCATORS (UNITED TEACHERS-LOS ANGELES), and PATRICIA STANYO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 312: Decided by a vote of 6-0 (1) find reason to believe that the RE-ELECT FRESHMAN OF THE REPUBLICAN MAJORITY (REFORM PAC), and LAUREN DEES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 313: Decided by a vote of 6-0 (1) find reason to believe that the RITE AID POLITICAL ACTION COMMITTEE, and JAMES KRAHULEC as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 314: Decided by a vote of 6-0 (1) find reason to believe that the RYDER EMPLS POLITICAL ACTION COMMITTEE (FORMERLY KNOWN AS RYDER CMTE EFFECTIVE GOVERNMENT), and ANTHONY G TEGNELIA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 315: Decided by a vote of 6-0 (1) find reason to believe that the SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL NO 99 FEDERAL POLITICAL ACTION COMMITTEE, and JANETT HUMPHRIES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 316: Decided by a vote of 6-0 (1) find reason to believe that the SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 434-B FEDERAL COPE, and VERDIA DANIELS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

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AF# 317: Decided by a vote of 6-0 (1) find reason to believe that the UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POL ED, and JAMES REED as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 318: Decided by a vote of 6-0 (1) find reason to believe that the LEHIGH VALLEY DEMOCRATIC COMMITTEE, and THOMAS F QUIRK as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 319: Decided by a vote of 6-0 (1) find reason to believe that the LIBERTARIAN PARTY OF ILLINOIS, and STEVEN I GIVOT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 320: Decided by a vote of 6-0 (1) find reason to believe that the NEW YORK STATE COMMITTEE OF THE WORKING FAMILIES PARTY, and LAWRENCE J HANLEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the RTB Circulation Report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

Table 1		Table 2	
Year	Age	Year	Age
1990	10	1990	10
1991	11	1991	11
1992	12	1992	12
1993	13	1993	13
1994	14	1994	14
1995	15	1995	15
1996	16	1996	16
1997	17	1997	17
1998	18	1998	18
1999	19	1999	19
2000	20	2000	20
2001	21	2001	21
2002	22	2002	22
2003	23	2003	23
2004	24	2004	24
2005	25	2005	25
2006	26	2006	26
2007	27	2007	27
2008	28	2008	28
2009	29	2009	29
2010	30	2010	30
2011	31	2011	31
2012	32	2012	32
2013	33	2013	33
2014	34	2014	34
2015	35	2015	35
2016	36	2016	36
2017	37	2017	37
2018	38	2018	38
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2023	43	2023	43
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2040	60	2040	60
2041	61	2041	61
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2047	67	2047	67
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2072	92	2072	92
2073	93	2073	93
2074	94	2074	94
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2077	97	2077	97
2078	98	2078	98
2079	99	2079	99
2080	100	2080	100

Federal Election Commission  
Certification for Administrative Fines  
March 20, 2001

Page 30

Attest:

March 28, 2001  
Date

Darlene Harris  
Darlene Harris  
Acting Deputy Secretary  
of the Commission

**WESTERN  
UNION**

CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES  
TO:LELA D \*KITTY\* PUMPHREY  
IDAHO REPUBLICAN PARTY  
PO BOX 2267  
BOISE ID 83701-2267

JOHN MUCKLE-REPORT ANALYSIS DIV.  
FEDERAL ELECTION COMMISSION  
999 E ST NW  
WASHINGTON DC 20463

MARCH 26, 2001

LELA D \*KITTY\* PUMPHREY  
IDAHO REPUBLICAN PARTY  
P O BOX 2267  
BOISE ID 83701

CO0170175  
AF# 288

DEAR LELA D \*KITTY\* PUMPHREY:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE A 30 DAY POST-GENERAL REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR IN WHICH A REGULARLY SCHEDULED GENERAL ELECTION IS HELD. THIS REPORT, COVERING THE PERIOD THROUGH NOVEMBER 27TH, SHALL BE FILED NO LATER THAN DECEMBER 7TH. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE COMMISSION INDICATE THAT THIS REPORT WAS FILED ON 01/02/2001, 26 DAYS LATE.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEDERAL ELECTION COMMISSION ("THE COMMISSION") TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 03/20/2001, THE COMMISSION FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT IDAHO REPUBLICAN PARTY AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE DECEMBER 7TH. BASED ON THE COMMISSION'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 CFR 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$5550.00. IT IS DUE BY 04/29/2001 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE  
LEVEL OF ACTIVITY: \$242502  
NUMBER OF DAYS LATE: 26  
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED:0

TO PAY THE CALCULATED CIVIL MONEY PENALTY  
TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED  
REMITTANCE AND YOUR PAYMENT TO THE COMMISSION AT THE ADDRESS ON

**WESTERN  
UNION**

WESTERN UNION COMMERCIAL SERVICES

PAGE 3. UPON RECEIPT OF YOUR PAYMENT, THE COMMISSION WILL SEND YOU A FINAL DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE TO THE COMMISSION'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 04/29/2001. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE COMMISSION WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE COMMISSION, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE COMMISSION STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXTRAORDINARY CIRCUMSTANCES THAT WILL NOT BE CONSIDERED INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 CFR 111.35(B)(1)(III) AND (4).

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE COMMISSION WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT IDAHO REPUBLICAN PARTY AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982 ("DCA") AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE COMMISSION MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 CFR 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE COMMISSION IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNLESS YOU NOTIFY THE COMMISSION IN WRITING THAT YOU WISH THE MATTER TO BE MADE PUBLIC.

ADDITIONAL INFORMATION ON THE COMMISSION'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE COMMISSION'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT JOHN G. MUCKLE IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 1, THEN PRESS 2) OR (202)694-1130.



**WESTERN  
UNION**

WESTERN UNION COMMERCIAL SERVICES

IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE,  
PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE  
NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

DANNY L. McDONALD  
CHAIRMAN

\* \* \* \* \*  
ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS  
IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 CFR 111.43,  
THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS  
\$5550.00 FOR THE 2000 30 DAY POST-GENERAL REPORT.  
PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE  
PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:  
FEDERAL ELECTION COMMISSION  
P. O. BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR  
OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:  
FIRSTAR - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 04/29/2001 UPON  
RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE COMMISSION WILL SEND YOU  
A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: IDAHO REPUBLICAN PARTY

FEC ID#: C00170175

AF#: 288

PAYMENT DUE DATE: 04/29/2001

PAYMENT AMOUNT DUE: \$5550.00



# Idaho Republican Party

P.O. Box 2267 • Boise, Idaho 83701 • Telephone (208) 343-6405 • Fax (208) 343-6414 • [www.idgop.org](http://www.idgop.org)

April 13, 2001

999 E Street NW Room #709  
Washington, DC 20463

RE: AF#288

Dear Mr. McDonald:

I am writing to explain the delay in filing the 30 day Post-General Report of Receipts and Disbursements which was due December 7, 2000. Our report was filed on January 2, 2001 and you have assessed penalties in the amount of \$5,550.

In mid-November my grandfather, who along with my grandmother reared me until I was a teenager, became gravely ill. I traveled to Florida, authorized his removal from life-support and took care of the numerous funeral arrangements. As one of his two sole survivors I was the only one able to take care of his affairs. My sister is disabled and was unable to take care of the arrangements. I remained in Florida until the first week in December, when I returned briefly to Idaho and then traveled back to Florida to settle my grandfather's affairs.

When I realized that the report was due, I immediately completed it and sent it to your offices.

Because of the extreme circumstances under which our report was late I am asking for your leniency in assessing such a heavy fine and request that you dismiss or reduce the fine accordingly.

I thank you in advance for your consideration.

Sincerely,

Lela D "Kitty" Pumphrey  
Treasurer, Idaho Republican Party

2001 APR 19 2 35 PM  
RECEIVED  
OFFICE OF  
THE ATTORNEY GENERAL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Via First Class Mail

April 20, 2001

Lela D. "Kitty" Pumphrey, Treasurer  
Idaho Republican Party  
PO Box 2267  
Boise, ID 83701

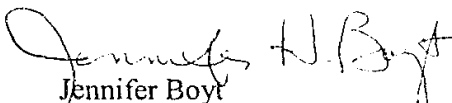
AF# 288  
ID# C00170175

Dear Ms. Pumphrey,

On March 20, 2001, the Federal Election Commission ("the Commission") found reason to believe that the Idaho Republican Party and you, as treasurer, violated 2 U.S.C. § 434(a) with respect to the 2000 30 Day Post-General Report.

On April 19, 2001, the Commission received your written response ("challenge") which is being reviewed by the Office of Administrative Review ("OAR"). If you have any questions regarding your challenge, please contact Jennifer Boyt, Reviewing Analyst, on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

  
Jennifer Boyt  
Reviewing Analyst

Date: April 23, 2001

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW  
CHALLENGE RECEIVED**

AF#: 0288

Committee Name: Idaho Republican Party

Committee ID#: C00170175

Committee Address (if different than in RTB mailgram) : N/A

Treasurer Name (if different than in RTB finding): N/A

**Attachments:**

Copy of RTB Circulation Report Dated February 27, 2001 and RTB  
Certification Dated March 28, 2001 Previously Provided to Your  
Office -

Attachment # : N/A

Copy of RTB Mailgram - Attachment # : See Declaration

Certified Return Receipt (to be forwarded at later date if not yet received) -

Attachment #: N/A

Other Reports (Redacted if Necessary) Used for RTB Review -

Attachment # : N/A

Telecons and Visitcons in Response to RTB Mailgram (Y/N): N

Attachment # : N/A

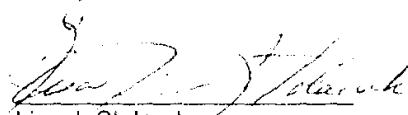
Original Correspondence Received by RAD in Response to  
RTB Mailgram (Y/N): N

Attachment # : N/A

RAD Staff Declaration - Attachment # : 1

# DECLARATION OF LISA J. STOLARUK

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the research conducted with regard to the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to the Idaho Republican Party Committee:
  - A) Prior Notice dated October 2, 2000 referencing the 2000 12 Day Pre-General and 30 Day Post General Reports;
  - B) Prior Notice dated November 13, 2000 referencing the 2000 30 Day Post-General Report;
  - C) Non-Filer Mailgram dated December 27, 2000 referencing the 30 Day Post-General Report;
  - D) Reason-to-Believe Mailgram dated March 26, 2001 referencing the 2000 30 Day Post-General Report.
3. I hereby certify that I have searched the Commission's public records and find that the Idaho Republican Party Committee filed the 30 Day Post-General Report with the Commission on January 2, 2001.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 23rd day of April, 2001.

  
Lisa J. Stolaruk  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission

# GENERAL ELECTION REPORT NOTICE

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## FEDERAL ELECTION COMMISSION

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PARTIES AND PACS

October 2, 2000

### I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT.	FILING
		MAILING DATE <sup>2</sup>	DATE
Pre-General	10/01/00 - 10/18/00	10/23/00	10/26/00
Post-General	10/19/00 - 11/27/00	12/07/00	12/07/00

### II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 18

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT.	FILING
		MAILING DATE <sup>2</sup>	DATE
Pre-General	10/01/00 - 10/18/00	10/23/00	10/26/00
Post-General	10/19/00 - 11/27/00	12/07/00	12/07/00

### III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 18<sup>3</sup>

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT.	FILING
		MAILING DATE <sup>2</sup>	DATE
Post-General	10/01/00 - 11/27/00	12/07/00	12/07/00

### WHO MUST FILE

Party Committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 7 (the Pre-General Report). All Party Committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

<sup>1</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>2</sup>Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

<sup>3</sup>Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart II.

**24 HOUR REPORT ON INDEPENDENT EXPENDITURES**

Any Party Committee or PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 19 and ending November 5 must report them within 24 hours. This report is *not* required when a Party Committee or PAC makes a contribution directly to a candidate.

**LABEL**

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

**ELECTRONIC FILING**

Political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing," and call the Data Division at (800) 424-9530 or (202) 694-1306.

**COMPLIANCE**

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to enforcement action if reports are inaccurate or are not filed on time.
- Beginning with the July 2000 reports, the Federal Election Commission implemented a **new administrative fine program**. Under this program, political committees that fail to file their reports on time may be subject to administrative penalties ranging from \$125 to \$16,000 (or more for repeat late- and non-filers).
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.

# GENERAL ELECTION REPORT NOTICE

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FEDERAL ELECTION COMMISSION

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PARTIES AND PACS

November 13, 2000

**\*\*\*REMINDER      REMINDER      REMINDER\*\*\***

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 7, 2000); otherwise, they must be received by the filing date (December 7, 2000). FEC Form 3X is enclosed.

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FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

October 15, 2001

Lela D. "Kitty" Pumphrey, as Treasurer  
Idaho Republican Party  
PO Box 2267  
Boise, Idaho 83701

AF# 288  
C00170175

Dear Dr. Pumphrey:


On March 20, 2001, the Federal Election Commission ("Commission") found reason to believe ("RTB") that the Idaho Republican Party and you, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file in a timely manner the 2000 30 Day Post-General Report. The Commission also made a preliminary determination that the civil money penalty was \$5,550.00 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact Jennifer H. Boyt, Reviewing Analyst, at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

  
Shawn Woodhead Werth  
Reviewing Officer  
Office of Administrative Review

Attachment



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463


October 11, 2001

**MEMORANDUM**

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR

ALISON L. DOONE  
DEPUTY STAFF DIRECTOR

FROM: SHAWN WOODHEAD WERTH   
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: AF# 288 - IDAHO REPUBLICAN PARTY AND LELA D.  
"KITTY" PUMPHREY, AS TREASURER

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 11, 2001

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 288 - Idaho Republican Party and Lela D. "Kitty" Pumphrey, as Treasurer

On March 20, 2001, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the Idaho Republican Party and Lela D. "Kitty" Pumphrey, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2000 30 Day Post-General Report and made a preliminary determination that the civil money penalty was \$5,500.00 based on the schedule of penalties at 11 C.F.R. § 111.43. The respondents were notified by the Reports Analysis Division via mailgram on March 26, 2001 of the Commission's finding and civil money penalty calculated at RTB.

**Respondents' Response**

On April 19, 2001, the Commission received the written response ("challenge") from the respondents who challenge the amount of the civil money penalty calculated at RTB. The Treasurer states that she "traveled to Florida" in "mid-November [because] my grandfather, who ... had reared me until I was a teenager, became gravely ill." After his death, "as one of his two sole survivors ... [and] the only one able to take care of his affairs," she handled "the numerous funeral arrangements." After "remaining in Florida until the first week in December," she "returned briefly to Idaho, and then traveled back to Florida to settle my grandfather's affairs. When I realized that the report was due, I immediately completed it and sent it to your offices. Because of the extreme circumstances under which our report was late I am asking ... that you dismiss or reduce the fine accordingly."

**Analysis of Challenge**

The 30 Day Post-General Report was sent registered/certified mail on January 2, 2001 and received on January 8, 2001. It was filed 26 days late.

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee shall file a 30 day post-general election report no later than 30 days after the general election which shall be complete as of the 20<sup>th</sup> day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii) and 11 C.F.R. § 104.5(c)(1)(iii). Reports sent by certified or registered mail are considered filed on the date of the U.S. post mark; otherwise, reports must be received by the close of business on December 7 to be timely filed. 11 C.F.R. § 104.5(e). Every political committee shall have a treasurer and may designate an assistant treasurer who shall assume the treasurer's duties and responsibilities if there

is a temporary or permanent vacancy in the office or the treasurer is unavailable. 2 U.S.C. § 432(a) and 11 C.F.R. § 102.7(a). The treasurer shall be personally responsible for the timely and complete filing of reports. 11 C.F.R. § 104.14(d).

Prior Notice for the 30 Day Post-General Report, which was sent to respondents on October 2, states that all quarterly filers, regardless of financial activity, must file a report 30 days after the general election. The second footnote of the Prior Notice explains that unless a report is sent timely via certified or registered mail, a report must be received by the filing date. It further informs them on the second page that treasurers are responsible for the timeliness and accuracy of their reports. In addition, a reminder notice was mailed on November 13 stating that all committees must file a Post General Election Report and that both the registered/certified mail postmark and filing dates are December 7. Thus, the respondents were notified on at least two occasions of their obligation to timely file a 30 Day Post General Report.

On September 27 and October 2, 2000, the Commission received letters signed by the Treasurer and Brian McCormack, Operations Director of the committee, respectively. Both letters, dated September 22, state that Dr. Pumphrey was elected Treasurer effective June 1999 and that there are two "[d]esignated agents authorized to sign for the Treasurer on all filings with the FEC [who] are Ms. Paula Garriott, Communication Director ... and Mr. Brian McCormack, Operations Director."

The Treasurer had to travel back and forth to Florida over the course of several weeks from mid-November into December because she was the only family member able to handle her grandfather's funeral arrangements and affairs. This, according to the respondents, affected their ability to file the 30 Day Post-General Report in a timely manner. While the Treasurer may have been temporarily unable to fulfill her duties as a result of her grandfather's illness and death, it appears that two other individuals, the Operations Director and Communication Director, had been "authorized" by the respondents as "designated agents" to "sign for the Treasurer on all filings" with the Commission. It also appears that someone other than the Treasurer or designated agents signed the 30 Day Post-General Report. Although as "designated agents" the Operations Director and Communication Director may have failed to file the report, it is still the Treasurer's responsibility in accordance with the Act to file reports in a timely manner.

Under the administrative fine regulations, three of the criteria used to calculate the civil money penalty are the level of activity, the election sensitivity of the report and whether the report is filed late or not at all. 11 C.F.R. § 111.43(d) and (e). The RTB civil money penalty for the 30 Day Post-General Report, which is a non-election sensitive report, was calculated based on the total receipts and total disbursements disclosed on the report (\$242,502) which was filed 26 days late. Based on the schedule of penalties at 11 C.F.R. § 111.43(a), the amount of the civil money penalty is  $[\$1,000.00 + (\$175 \times 26)] \times [1 + (.25 \times 0)]$  or \$5,550.00.

While the Reviewing Officer is sympathetic to the Treasurer's loss of her grandfather, this situation does not fall within the list of defenses outlined in 11 C.F.R. § 111.35(b) of "extraordinary circumstances" which were beyond their control, lasted for at least 48 hours and prevented them from filing the report. The respondents presented no evidence that a factual error was made, that the civil money penalty was miscalculated at RTB or that extraordinary circumstances existed which prevented them from filing the 30 Day Post-General Report in a timely manner. The Reviewing Officer, therefore, recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$5,550.00.

### **OAR Recommendations**

- (1) Make a final determination in AF# 288 that the Idaho Republican Party and Lela D. "Kitty" Pumphrey, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$5,550.00; and
- (2) Send the appropriate letter.

Staff Assigned: Jennifer H. Boyt

### **Attachments**

- Attachment 1 - Challenge Received from Respondents
- Attachment 2 - Declaration from the Reports Analysis Division
- Attachment 3 - Declaration from OAR

**DECLARATION OF SHAWN WOODHEAD WERTH**

1. I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I supervise the research conducted with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2000 30 Day Post-General Report, covering the period October 1 through November 27, 2000, is due December 7, 2000. Unless sent timely by certified or registered mail, the report must be received by the close of business on December 7 to be filed in a timely manner.
3. It is the practice of the Commission's Mail Room to date stamp each report as it is received and the Disclosure Division to complete an Envelope Replacement Page disclosing the method used to file the report.
4. I hereby certify that I have searched the Commission's public records and that the documents identified herein are true and accurate copies of the:
  - a) Summary and Envelope Replacement Pages for the 2000 30 Day Post-General Report filed via certified/registered mail by the Idaho Republican Party and Lela D. "Kitty" Pumphrey, as Treasurer. According to the Commission's records, the report was mailed on January 2, 2001 and received on January 8, 2001. On Lines 6(c) and 7 of the Summary Page, it lists total receipts of \$104,103.71 and total disbursements of \$138,399.41. The name "Lela D Pumphrey" is printed on the Name of Treasurer line and on the Treasurer Signature line it is signed "W L Clark (for L. Pumphrey)"; and
  - b) amended Statement of Organization in the form of two letters dated September 22 and Envelope Replacement Pages filed by the Idaho Republican Party. According to the Commission's records, the letter received September 27, 2000 is signed by Lela D. "Kitty" Pumphrey, as Treasurer, and the letter received October 2, 2000 is signed by Brian McCormack, Operations Director. Both letters state that effective June 1999, Dr. Pumphrey was elected Treasurer and that Ms. Paula Garriott, Communication Director, and Mr. Brian McCormack, Operations Director, are designated agents authorized to sign for the Treasurer on all filings with the FEC.
5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 11<sup>th</sup> of October, 2001.



Shawn Woodhead Werth  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

RECEIVED  
FEC MAIL ROOM  
2000 SEP 27 P 1:34

September 22, 2000

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463


RE: Idaho Republican Party, Identification Number C00170175  
Amended Statement of Organization

Gentlemen:

This letter is an amendment of our Statement of Organization to update your records. Effective 6/99 Dr. Lela D. 'Kitty' Pumphrey was elected Treasurer of the Idaho Republican Party to replace Ms. Cheryl Miller. The official mailing address for all correspondence should continue to be the Party's address—P. O. Box 2267, Boise, ID 83701. Designated Agents authorized to sign for the Treasurer on all filings with the FEC are Ms. Paula Garriott, Communication Director of the Idaho Republican Party and Mr. Brian McCormack, Operations Director of the Idaho Republican Party. In the event the signature of the duly elected Treasurer is required, she is sending a copy of this letter with her signature affixed.

Respectfully,

Brian McCormack, Operations Director  
Idaho Republican Party



Lela D. 'Kitty' Pumphrey, Treasurer  
Idaho Republican Party

## Federal Election Commission

# **ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/>	Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/>	First Class Mail	POSTMARKED 9/23/00
<input type="checkbox"/>	Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/>	No Postmark	
<input type="checkbox"/>	Postmark Illegible	
<input type="checkbox"/>	Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/>	Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/>	Other ( Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/>	Electronic Filing	
<i>CR</i> PREPARER		9/27/00 DATE PREPARED





# Idaho Republican Party

P.O. Box 2267 • Boise, Idaho 83701 • Telephone (208) 343-6405 • Fax (208) 343-6414 • [www.idgop.org](http://www.idgop.org)

September 22, 2000

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE: Idaho Republican Party, Identification Number C00170175  
Amended Statement of Organization

Gentlemen:

This letter is an amendment of our Statement of Organization to update your records. Effective 6/99 Dr. Lela D. 'Kitty' Pumphrey was elected Treasurer of the Idaho Republican Party to replace Ms. Cheryl Miller. The official mailing address for all correspondence should continue to be the Party's address—P. O. Box 2267, Boise, ID 83701. Designated Agents authorized to sign for the Treasurer on all filings with the FEC are Ms. Paula Garriott, Communication Director of the Idaho Republican Party and Mr. Brian McCormack, Operations Director of the Idaho Republican Party. In the event the signature of the duly elected Treasurer is required, she is sending a copy of this letter with her signature affixed.

Respectfully,

Brian McCormack, Operations Director  
Idaho Republican Party

RECEIVED  
FEC MAIL ROOM  
2000 OCT - 2 P 12: 26

Federal Election Commission

# **ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/>	Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/>	Other ( Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/>	Electronic Filing	
<i>er</i> PREPARER		10/2/00 DATE PREPARED

(6/2000)

**REPORT OF RECEIPTS AND DISBURSEMENTS**For Other than An Authorized Committee  
(Summary Page)RECEIVED  
FEC MAIL ROOM

2001 JAN -8 P 12:16

1. NAME OF COMMITTEE (in full) Idaho Republican Party		2. FEC IDENTIFICATION NUMBER C00170175
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 2267		
CITY, STATE and ZIP CODE Boise, ID 83701		
3. <input type="checkbox"/> This committee qualified as a multicandidate committee. (see FEC FORM 1M)		

**4. TYPE OF REPORT**(a) ☐ April 15 Quarterly Report☐ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid-Year Report (Non-election Year Only)☐ Termination Report

Monthly Report Due On:

☐ February 20☐ June 20☐ October 20☐ March 20☐ July 20☐ November 20☐ April 20☐ August 20☐ December 20☐ May 20☐ September 20☐ January 31☐ Twelfth day report preceding

(Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☒ Thirtieth day report following the General Election on

11/07/2000

in the State of ID

(b) Is this Report an Amendment?

☐ YES☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-date
5. Covering Period	10/01/2000 through 11/27/2000		
6. (a) Cash on Hand January 1, 19 00			-8,946.07
(b) Cash on Hand at Beginning of Reporting Period		35,404.10	
(c) Total Receipts (from Line 19)		104,103.71	443,030.09
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		139,507.81	434,084.02
7. Total Disbursements (from Line 30)		138,399.41	432,975.62
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		1,108.40	1,108.40
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)			For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)			

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

LELA D PUMPHREY

Signature of Treasurer

[Signature] (FOR L. PUMPHREY)

Date

12-20-00

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to penalties of 2 U.S.C. §437g.

FEC FORM 3X  
(Revised 9/93)

Federal Election Commission

# **ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/>	Hand Delivered	Date of Receipt
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<input checked="" type="checkbox"/>	Registered/Certified Mail	POSTMARKED (R/C) 1-2-01
<input type="checkbox"/>	No Postmark	
<input type="checkbox"/>	Postmark Illegible	
<input type="checkbox"/>	Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/>	Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/>	Other ( Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/>	Electronic Filing	
<i>Jm D</i> PREPARER		1-8-01 DATE PREPARED

(6/2000)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2001 NOV -7 P 3:43

November 7, 2001

**SENSITIVE**

MEMORANDUM

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR

ALISON L. DOONE  
DEPUTY STAFF DIRECTOR

FROM: SHAWN WOODHEAD WERTH  
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: FINAL DETERMINATION RECOMMENDATION IN  
AF# 288 - IDAHO REPUBLICAN PARTY AND LELA  
D. "KITTY" PUMPHREY, AS TREASURER

On March 20, 2001, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the Idaho Republican Party and Lela D. "Kitty" Pumphrey, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2000 30 Day Post General Report in a timely manner. The report was filed on January 2, 2001, 26 days late. As a result, on March 20, 2001, the Commission also made a preliminary determination that the civil money penalty was \$5,550.00 based on the schedule of penalties at 11 C.F.R. § 111.43.

On April 19, 2001, the Commission received the respondents' written response ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation dated October 11, 2001 was forwarded to the Commission. A copy was simultaneously forwarded to the respondents. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$5,550.00 because the respondents submitted no evidence that a factual error was made, that the civil money penalty was miscalculated at RTB or that extraordinary circumstances existed which prevented them from filing the 30 Day Post General Report in a timely manner.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in the respondents' challenge or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received from the respondents.

#### **OAR Recommendations**

- (1) Make a final determination in AF# 288 that the Idaho Republican Party and Lela D. "Kitty" Pumphrey, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$5,550.00; and
- (2) Send the appropriate letter.

2raum



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**SENSITIVE**

DATE & TIME OF TRANSMITTAL: Wednesday, November 07, 2001 4:00

BALLOT DEADLINE: Tuesday, November 13, 2001 4:00

COMMISSIONER: MASON, McDONALD, SANDSTROM, SMITH, THOMAS, WOLD

SUBJECT: **Final Determination Recommendation in AF #288 -  
Idaho Republican Party and Lela D. "Kitty" Pumphrey,  
as treasurer. Memorandum from the Reviewing Officer,  
Office of Administrative Review dated November 7, 2001.**

- ( ) I approve the recommendation(s)
- ( ) I object to the recommendation(s)
- ( ) I abstain from voting on the recommendation(s)
- ( ) I am recused from voting on the recommendation(s)

A definite vote is required. All ballots must be signed and dated. Please return  
**ONLY THE BALLOT** to the Commission Secretary. Please return ballot no later  
than date and time shown above.

DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Idaho Republican Party and ) AF #288  
Lela D. "Kitty" Pumphrey, as )  
Treasurer - Final )  
Determination Recommendation. )

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal  
Election Commission, do hereby certify that on  
November 9, 2001 the Commission decided by a vote  
of 6-0 to take the following actions in the above-  
captioned matter:

1. Make a final determination in AF #288  
that the Idaho Republican Party and  
Lela D. "Kitty" Pumphrey, as Treasurer,  
violated 2 U.S.C. §434(a) and assess a  
civil money penalty of \$5,550.00.
2. Send the appropriate letter, as recommended  
in the Reviewing Officer's Memorandum dated  
November 7, 2001.

(Continued)



Federal Election Commission  
Certification for AF #288  
November 9, 2001

Page 2

Commissioners Mason, McDonald, Sandstrom, Smith,  
Thomas, and Wold voted affirmatively for the decision.

Attest:

November 9, 2001  
Date

Darlene Harris  
for Mary W. Dove  
Secretary of the Commission

Received in the Secretariat: Wed., Nov. 07, 2001 3:43 p.m.  
Circulated to the Commission: Wed., Nov. 07, 2001 4:00 p.m.  
Deadline for vote: Tues., Nov. 13, 2001 4:00 p.m.

lrd

**WESTERN  
UNION**

CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES  
TO: LELA D. "KITTY" PUMPHREY, TREASURER  
IDAHO REPUBLICAN PARTY  
PO BOX 2267  
BOISE ID 83701-2267

JENNIFER BOYT/OAR, REVIEW  
FEDERAL ELECTION COMMISSION  
999 E ST NW  
WASHINGTON DC 20463

FEDERAL ELECTION COMMISSION  
999 E STREET, NW  
WASHINGTON, DC 20463

NOVEMBER 13, 2001

VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

LELA D. "KITTY" PUMPHREY, TREASURER  
IDAHO REPUBLICAN PARTY  
P.O. BOX 2267  
BOISE, ID 83701

ID# C00170175  
AF# 288

DEAR DR. PUMPHREY:

ON MARCH 20, 2001, THE FEDERAL ELECTION COMMISSION ("THE COMMISSION") FOUND REASON TO BELIEVE ("RTB") THAT THE IDAHO REPUBLICAN PARTY AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) FOR FAILING TO FILE THE 2000 30 DAY POST GENERAL REPORT IN A TIMELY MANNER. BY MAILGRAM DATED MARCH 26, 2001, THE COMMISSION SENT YOU NOTIFICATION OF THE RTB FINDING THAT INCLUDED A CIVIL MONEY PENALTY CALCULATED AT RTB OF \$5,550.00 IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43. ON APRIL 19, 2001, THE OFFICE OF ADMINISTRATIVE REVIEW RECEIVED YOUR WRITTEN RESPONSE CHALLENGING THE AMOUNT OF THE CIVIL MONEY PENALTY CALCULATED AT RTB.

THE REVIEWING OFFICER REVIEWED THE COMMISSION'S RTB FINDING WITH ITS SUPPORTING DOCUMENTATION AND YOUR WRITTEN RESPONSE. BASED ON THIS REVIEW, THE REVIEWING OFFICER RECOMMENDED THAT THE COMMISSION MAKE A FINAL DETERMINATION THAT THE IDAHO REPUBLICAN PARTY AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY IN THE AMOUNT OF \$5,550.00 IN ACCORDANCE WITH 11 C.F.R. 111.43. THE BASIS FOR THE REVIEWING OFFICER'S RECOMMENDATION WAS INCLUDED IN THE FINAL DETERMINATION REPORT, A COPY OF WHICH WAS SENT TO YOU ON OCTOBER 15, 2001.

ON NOVEMBER 9, 2001, THE COMMISSION ADOPTED THE REVIEWING

**WESTERN  
UNION**

## WESTERN UNION COMMERCIAL SERVICES

OFFICER'S RECOMMENDATION AND MADE A FINAL DETERMINATION THAT THE IDAHO REPUBLICAN PARTY AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESSED A CIVIL MONEY PENALTY OF \$5,550.00. IT IS BASED ON THE SAME FACTORS USED TO CALCULATE THE CIVIL MONEY PENALTY AT RTB.

## TO PAY THE CIVIL MONEY PENALTY

TO PAY THE CIVIL MONEY PENALTY, SEND THE ENCLOSED FORM AND YOUR PAYMENT TO THE ADDRESS ON PAGE 3 WITHIN 30 DAYS OF RECEIPT OF THIS LETTER.

## IF YOU DO NOT PAY THE CIVIL MONEY PENALTY

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982 ("DCA") AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 ("DCIA"), 31 U.S.C. 3701 ET SEQ. IF YOU DO NOT PAY THIS DEBT WITHIN 30 DAYS (OR FILE A WRITTEN PETITION TO A FEDERAL DISTRICT COURT - SEE BELOW), THE COMMISSION WILL TRANSFER THE DEBT TO THE U.S. DEPARTMENT OF THE TREASURY ("TREASURY") FOR COLLECTION. WITHIN 5 DAYS OF THE TRANSFER TO TREASURY, TREASURY WILL CONTACT THE DEBTOR AND REQUEST PAYMENT. TREASURY CURRENTLY CHARGES A FEE OF 18% OF THE CIVIL MONEY PENALTY AMOUNT FOR ITS COLLECTION SERVICES. THE FEE WILL BE ADDED TO THE AMOUNT OF THE CIVIL MONEY PENALTY THAT YOU OWE. SHOULD TREASURY'S ATTEMPTS FAIL, TREASURY WILL REFER THE DEBT TO A PRIVATE COLLECTION AGENCY ("PCA"). IF THE DEBT IS REFERRED TO A PCA, THE TREASURY AND PCA COLLECT A FEE OF 28% OF THE CIVIL MONEY PENALTY AMOUNT WHICH WILL BE ADDED TO THE AMOUNT OF THE CIVIL MONEY PENALTY THAT YOU OWE. IF THE DEBT REMAINS UNPAID, TREASURY MAY RECOMMEND THAT THE COMMISSION REFER THE MATTER TO THE DEPARTMENT OF JUSTICE FOR LITIGATION.

## IF YOU CHOOSE TO APPEAL THE FINAL DETERMINATION AND/OR CIVIL MONEY PENALTY

IF YOU CHOOSE TO APPEAL THE FINAL DETERMINATION, YOU SHOULD SUBMIT A WRITTEN PETITION, WITHIN 30 DAYS OF RECEIPT OF THIS LETTER, TO THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT IN WHICH THE COMMITTEE OR YOU RESIDE, OR TRANSACT BUSINESS, REQUESTING THAT THE FINAL DETERMINATION BE MODIFIED OR SET ASIDE. SEE 2 U.S.C. 437G(A)(4)(C)(III). YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF THE RESPONDENTS' RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

THE CONFIDENTIALITY PROVISIONS AT 2 U.S.C. 437G(A)(12) NO LONGER APPLY AND THIS MATTER IS NOW PUBLIC. THE FILE WILL BE MADE A PART OF THE PUBLIC RECORD PURSUANT TO 11 C.F.R. 111.42(3). ALTHOUGH THE COMPLETE FILE MUST BE PLACED ON THE PUBLIC RECORD WITHIN 30 DAYS FROM THE DATE OF THE COMMISSION'S NOTIFICATION, THIS COULD OCCUR AT ANY TIME FOLLOWING CERTIFICATION OF THE COMMISSION'S VOTE.

IF YOU HAVE ANY QUESTIONS REGARDING THE PAYMENT OF THE CIVIL MONEY PENALTY, PLEASE CONTACT JENNIFER H. BOYT ON OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

**WESTERN  
UNION**

WESTERN UNION COMMERCIAL SERVICES

DANNY L. MCDONALD  
CHAIRMAN-----  
**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R.  
111.43, THE CIVIL MONEY PENALTY IS \$5,550.00 FOR THE 2000 30 DAY  
POST GENERAL REPORT.

THIS PENALTY SHOULD BE PAID BY CHECK OR MONEY ORDER, MADE  
PAYABLE TO THE FEDERAL ELECTION COMMISSION. IT SHOULD BE SENT BY  
MAIL TO:

FEDERAL ELECTION COMMISSION  
PO BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR PAYMENT BY COURIER OR OVERNIGHT  
DELIVERY, PLEASE USE THIS ADDRESS:

FIRSTAR - GOVERNMENT LOCKBOX  
FEC # 952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE FORM AND PAYMENT ARE DUE WITHIN 30 DAYS OF RECEIPT OF THIS  
LETTER.

PLEASE DETACH AND RETURN THIS PORTION BELOW WITH YOUR PAYMENT

-----

FOR IDAHO REPUBLICAN PARTY

FEC ID # C00170175

AF # 288

PAYMENT AMOUNT DUE \$5,550.00

FOR Idaho Republican Party

FEC ID # C00170175

AF # 288

PAYMENT AMOUNT DUE \$5,550.00

To reply by Mailgram Message, see reverse side for Western Union's toll-free number.

QUALITY IS OUR PRIORITY FOR LOCKBOX 2182

SEQ# 001 \$ 0000555000 BA# 1 12-05-01 20 9



IDAHO REPUBLICAN PARTY  
PRINCIPAL ACCOUNT  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

PAYMENT & AGREEMENT  
NOV 30 1991  
AMOUNT DUE  
NOV 30 1991

No 20289

\*\*\*\*\* Five Thousand Five Hundred Fifty and 00/100 \*\*\*\*\*

DATE

AMOUNT

Nov 30 01

\$5,550.00

PA.  
TO THE  
CREDIT  
OF

FEDERAL ELECTION COMMISSION  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

*Theresa Clark*

★ FIRST STAR

THIS IS THE END OF ADMINSTRATIVE FINE CASE

# 288

DATE FILMED 1/2/02 CAMERA NO. 1

CAMERAMAN EEB

2002 JAN 2 11:00 AM